

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

- [1] **ANGELA AYALA-MARTINEZ**,
aka "La Señora,"
aka "La Vieja,"
[Counts 1, 2, 5 & 6],..
- [2] **MANUEL PEREZ-COLON**,
aka "Tito Manuel,"
[Counts 1 & 2],
- [3] **JORGE LUCAS SANTIAGO-RIVERA**,
aka "Jay,"
[Counts 1 & 2],
- [4] **RICARDO VELEZ-RAMOS**,
aka "Ricky,"
[Count 1],
- [5] **FLORENCIO SANCHEZ-DE LEON**,
[Counts 1 & 3],
- [6] **YOLANDA RUIZ**,
[Counts 1 & 2],
- [7] **JOSE CARASQUILLO**,
aka "Joito,"
[Counts 1, 2 & 3],
- [8] **JORGE ALICEA-SERRANO**,
aka "Jockey,"
[Count 1],
- [9] **ANGEL LUIS MANGUAL-GILBERT**,
aka "Cuqui Mangual,"
[Count 1],
- [10] **FRANKIE PIETRI-SEPULVEDA**,
[Count 1 & 2],
- [11] **DANIEL SANTIAGO-ORTIZ**,
aka "Danny El Gordo,"
[Counts 1 & 2],
- [12] **WANDI AYALA**,
[Counts 1 & 2],
- [13] **EDDIE SEVILLA**,
[Counts 1 & 2],

INDICTMENT

CRIMINAL NO. 97-82 (SEC)

Violations:

Title 21, U.S.C., §846
(conspiracy to possess
and distribute controlled
substances)

Title 21, U.S.C., §841(a)(1)
(possession of controlled
substances with the
intent to distribute)

Title 18, U.S.C., §1956(h)
(conspiracy to commit
money laundering offenses)

Title 18, U.S.C., §1956
(money laundering)

Title 18, U.S.C., §1957
(engaging in monetary
transactions in property
derived from specified
unlawful activity -
illegal drug trafficking)

Title 18, U.S.C., §2
(aiding and abetting)

(SIX COUNTS)

RECD.	TO JUDGE
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By	
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- [14] **FELICITA SOTO,**
aka "Fela,"
[Counts 1 & 2],
- [15] **ANTONIO GONZALEZ-VEGA,**
aka "Pollo,"
[Counts 1 & 2],
- [16] **MARIA BARBOSA-RODRIGUEZ,**
[Counts 1, 2, 5 & 6],
- [17] **CARLOS MANGUAL-SANTIAGO,**
[Counts 1 & 2],
- [18] **ANDY GARCIA-TORRES,**
[Counts 1 & 2],
- [19] **MANUEL GARCIA-TORRES,**
[Counts 1 & 2]
- [20] **EDWIN MELENDEZ-NEGRON,**
aka "Danny Gongolo,"
[Counts 1 & 2],
- [21] **RAUL DIAZ,**
aka "El Viejo Raulito,"
[Count 1],
- [22] **DOUGLAS DIAZ,**
[Count 1],
- [23] **ENRIQUE MALAVE-DIAZ,**
aka "Enriquito,"
[Counts 1, 2 & 4],
- [24] **LUZ M. DIAZ-LUGO,**
[Counts 1 & 4],
- [25] **FELIX R. MIRANDA-MUNOZ,**
[Counts 1 & 4],
- [26] **ANGEL R. SUAREZ-VARGAS,**
[Counts 1 & 4],
- [27] **HECTOR RETAMAR-RUIZ,**
[Count 1],
- [28] **PABLO DIAZ MORALES,**
aka "Pablin,"
[Count 1],
- [29] **ALEXANDER BOSCANA-RODRIGUEZ,**
[Counts 1 & 2],
- [30] **JULIO GONZALEZ-MARTINEZ,**
aka "El Viejo Juli,"
[Counts 1 & 4],

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- [31] **MARTIN ARROYO-CRUZ,**
[Counts 1 & 2],
- [32] **HECTOR DOMINICI-GONZALEZ,**
[Counts 1 & 2],
- [33] **MARIBEL DOMINICI,**
[Counts 1 & 2],
- [34] **SANTOS GONZALEZ-BRACERO,**
[Count 3],
- [35] **SAMMY RAMIREZ,**
[Count 3], and
- [36] **ORLANDO ROSA**
aka "Oly,"
[Counts 1 & 2],

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

From in or about October of 1994, and ending on a date unknown, but no earlier than on or about the date of the return of this Indictment, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

- [1] **ANGELA AYALA-MARTINEZ,**
aka "La Señora,"
aka "La Vieja,"
- [2] **MANUEL PEREZ-COLON,**
aka "Tito Manuel,"
- [3] **JORGE LUCAS SANTIAGO-RIVERA,**
aka "Jay,"
- [4] **RICARDO VELEZ-RAMOS,**
aka "Ricky,"
- [5] **FLORENCIO SANCHEZ-DE LEON,**
- [6] **YOLANDA RUIZ**
- [7] **JOSE CARASQUILLO,**
aka "Joito,"

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- [8] **JORGE ALICEA-SERRANO,**
aka "Jockey,"
- [9] **ANGEL LUIS MANGUAL-GILBERT,**
aka "Cuqui Mangual,"
- [10] **FRANKIE PIETRI-SEPULVEDA,**
- [11] **DANIEL SANTIAGO-ORTIZ,**
aka "Danny El Gordo,"
- [12] **WANDI AYALA,**
- [13] **EDDIE SEVILLA,**
- [14] **FELICITA SOTO,**
aka "Fela,"
- [15] **ANTONIO GONZALEZ-VEGA,**
aka "Pollo,"
- [16] **MARIA BARBOSA-RODRIGUEZ**
- [17] **CARLOS MANGUAL-SANTIAGO,**
- [18] **ANDY GARCIA-TORRES,**
- [19] **MANUEL GARCIA-TORRES,**
- [20] **EDWIN MELENDEZ-NEGRON,**
aka "Danny Gongolo,"
- [21] **RAUL DIAZ,**
aka "El Viejo Raulito,"
- [22] **DOUGLAS DIAZ,**
- [23] **ENRIQUE MALAVE-DIAZ,**
aka "Enriquito,"
- [24] **LUZ M. DIAZ-LUGO,**
- [25] **FELIX R. MIRANDA-MUNOZ,**
- [26] **ANGEL R. SUAREZ-VARGAS,**
- [27] **HECTOR RETAMAR-RUIZ,**
- [28] **PABLO DIAZ MORALES,**
aka "Pablin,"
- [29] **ALEXANDER BOSCANA-RODRIGUEZ,**
- [30] **JULIO GONZALEZ-MARTINEZ,**
aka "El Viejo Juli,"
- [31] **MARTIN ARROYO CRUZ,**
- [32] **HECTOR DOMINICI-GONZALEZ,**
- [33] **MARIBEL DOMINICI, and**
- [36] **ORLANDO ROSA,**
aka "Oly,"

the defendants herein, did, knowingly, willfully, unlawfully, and intentionally, combine, conspire, and agree with each other and with divers other persons to the grand jury known and unknown, to commit offenses against the United States, to wit, to knowingly and intentionally possess with the intent to distribute and to

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distribute multi-kilogram amounts of cocaine, a Schedule II Narcotic Drug Controlled Substance, which amounts of cocaine exceeded five (5) kilograms; that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1).

I. OBJECTS OF THE CONSPIRACY

The objects of said conspiracy were, among others:

1. To import large amounts of controlled substances into the District of Puerto Rico for further distribution in Puerto Rico.
2. To distribute large amounts of controlled substances, including cocaine, at various drug points (known as "*puntos*") for significant financial gain or profit.

II. MANNER AND MEANS USED TO ACCOMPLISH THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would further and accomplish the objects of the conspiracy included, among others, the following:

1. It was part of the conspiracy that the defendants and their co-conspirators would purchase multi-kilogram quantities of cocaine at wholesale prices.
2. It was a further part of the conspiracy that the defendants and co-conspirators would sell the multi-kilogram quantities of cocaine at drug points ("*puntos*").
3. It was a further part of the conspiracy that the significant profits generated from the sale of controlled substances at drug proceeds would be delivered to [1] **ANGELA AYALA-MARTINEZ**.

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4. It was a further part of the conspiracy that the defendants and co-conspirators would conceal and store drug proceeds at the residences of various co-conspirators, known as "stash houses."

5. It was a further part of the conspiracy that the defendants and co-conspirators would attempt to avoid detection by governmental authorities by, among other means, placing properties in the names of third parties and bribing law enforcement officials.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

It was a further part of the conspiracy that the defendants and their co-conspirators would have different roles and would perform different tasks in furtherance of the conspiracy as follows:

A. LEADER

1. [1] **ANGELA AYALA-MARTINEZ**, also known as (aka) "La Señora," aka "La Vieja," was the leader and organizer of the drug-trafficking organization described in Counts One and Two of this Indictment. As the leader of the drug trafficking organization, she would lead, organize, control, and supervise other members of the conspiracy who would sell controlled substances at drug points located in and around Ponce, Puerto Rico. For example, the **ANGELA AYALA** organization controlled drug points in, among other locations, the "*Santiago Iglesias*" and "*La Cantera*" neighborhoods

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located in Ponce, Puerto Rico. **ANGELA AYALA** directed and supervised numerous subordinates whose principal tasks included: (a) supplying sellers with the drugs to be sold at drug points; (b) collecting the proceeds derived from the sale of illegal narcotics at drug points; (c) packaging drugs for sale at drug points; (d) providing protection to [1] **ANGELA AYALA-MARTINEZ**, the illegal narcotics being sold at drug points, and the drug trafficking proceeds; (e) selling narcotics at drug points; and (e) concealing the drug proceeds derived from the sales at drug points.

B. SUPPLIERS

[8] **JORGE ALICEA SERRANO**, aka "Jockey," and others were the persons who would receive large quantities of cocaine from Colombia, South America, and would sell said cocaine to [1] **ANGELA AYALA-MARTINEZ**, for later distribution at drug points.

C. RUNNERS

The roles of other members of the **ANGELA AYALA** drug trafficking organization were that of "runners." These runners would collect the significant proceeds derived from the drug point sales already completed by the sellers and would deliver those proceeds to [1] **ANGELA AYALA-MARTINEZ**. They generally acted as managers and supervisors of the operations at the drug points.

The following defendants and co-conspirators acted as "runners" within the conspiracy:

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[2] MANUEL PEREZ-COLON aka "Tito Manuel,"
[3] JORGE LUCAS SANTIAGO-RIVERA, aka "Jay,"
[7] JOSE CARASQUILLO, aka "Joito,"
[10] FRANKIE PIETRI-SEPULVEDA,
[11] DANIEL SANTIAGO-ORTIZ, aka "Danny El Gordo,"
[15] ANTONIO GONZALEZ-VEGA, aka "El Pollo,"
[17] CARLOS MANGUAL-SANTIAGO,
[18] ANDY GARCIA-TORRES,
[19] MANUEL GARCIA-TORRES,
[20] EDWIN MELENDEZ-NEGRON, aka "Danny Gongolo,"
[23] ENRIQUE MALAVE-DIAZ, aka "Enriquito,"
[29] ALEXANDER BOSCANA-RODRIGUEZ, and
[36] ORLANDO ROSA, aka "Oly."

D. BODYGUARDS

[1] **ANGELA AYALA-MARTINEZ** also used bodyguards as part of her drug-trafficking organization described in Counts One and Two of the Indictment. These bodyguards would provide protection to [1] **ANGELA AYALA-MARTINEZ** and would also collect unpaid drug debts. Members of the conspiracy who acted as bodyguards included defendants and co-conspirators

[6] **YOLANDA RUIZ**, and
[28] **PABLO DIAZ-MORALES**, aka "Pablin."

E. CONCEALERS/GUARDIANS OF DRUG PROCEEDS

Other members of the conspiracy would further the objectives of the conspiracy by concealing and safeguarding the assets and profits obtained by the **ANGELA AYALA** drug trafficking organization. Members of the organization who acted as concealers and guardians of drug proceeds include defendants and co-conspirators

[6] **YOLANDA RUIZ**,
[12] **WANDI AYALA**,
[13] **EDDIE SEVILLA**,
[14] **FELICITA SOTO**,

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[16] MARIA BARBOSA-RODRIGUEZ,
[31] MARTIN ARROYO-CRUZ,
[32] HECTOR DOMINICI-GONZALEZ, and
[33] MARIBEL DOMINICI.

F. DRUG NEGOTIATORS

Certain members of the organization would negotiate multi-kilogram drug transactions on behalf of [1] **ANGELA AYALA-MARTINEZ**. Defendants and co-conspirators who would act as drug negotiators included

[4] RICARDO VELEZ-RAMOS, aka "Ricky,"
[9] ANGEL LUIS MANGUAL-FILBERT, aka "Cuqui Mangual," and
[10] FRANKIE PIETRI-SEPULVEDA.

G. LAW ENFORCEMENT OFFICIALS

The **ANGELA AYALA** organization included corrupt law enforcement officials who would provide [1] **ANGELA AYALA-MARTINEZ** with information as to on-going investigations concerning her drug trafficking organization, the execution of search warrants by police, and would otherwise abuse their positions of public trust in order to aid the drug trafficking organization. These corrupt law enforcement officials included Puerto Rico Police Officer

[5] FLORENCIO SANCHEZ DE LEON,
and Puerto Rico Corrections Officer

[6] YOLANDA RUIZ.

H. DRUG SELLERS/DEALERS

In order to distribute the large quantities of illegal narcotics obtained by the **ANGELA AYALA** organization, drug sellers

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or dealers (known as "tiradores") would sell drugs, including cocaine and heroin, at different drug points in and around Ponce, Puerto Rico, which were located in, among other areas, the "Santiago Iglesias" the "La Cantera" neighborhoods. Members of the organization whose role was that of a seller/dealer at a drug point, included, among others,

[24] LUZ M. DIAZ-LUGO,
[25] FELIX R. MIRANDA-MUNOZ,
[26] ANGEL R. SUAREZ-VARGAS, and
[30] JULIO GONZALEZ-MARTINEZ, aka "El Viejo Juli."

IV. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico or elsewhere, within the jurisdiction of this Court:

1. At all times during the existence of the conspiracy, the defendants and co-conspirators, and others to the grand jury known and unknown, while aiding and abetting each other, did possess with intent to distribute and did distribute controlled substances, to wit: cocaine and heroin, which was sold to customers at one or more drug points for substantial financial gain or profit.

2. At all times during the existence of the conspiracy, the defendants and co-conspirators, and others to the grand jury known and unknown, while aiding and abetting each other, did store and

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hide from view and detection controlled substances, to wit: cocaine and heroin, and/or the proceeds from the sales thereof.

3. On or about August 23, 1996, [1] **ANGELA AYALA-MARTINEZ**, with the assistance of [16] **MARIA BARBOSA-MARTINEZ**, sold one hundred, sixty and nine tenths (160.9) grams (gross weight) of cocaine to a confidential source.

4. On or about December 13, 1996, [1] **ANGELA AYALA-MARTINEZ**, with the assistance of [16] **MARIA BARBOSA-MARTINEZ**, sold one hundred, fifty-eight and six tenths (158.6) grams (gross weight) of cocaine to a confidential source.

5. As instructed by [1] **ANGELA AYALA-MARTINEZ**, from in or about September of 1996, through in or about January of 1997, [4] **RICARDO VELEZ-RAMOS**, aka "Ricky," and [9] **ANGEL LUIS MANGUAL GILBERT**, aka "Cuqui Mangual," negotiated with a confidential source the purchase of two hundred (200) kilograms of cocaine.

6. Counts Two, Four, Five and Six are incorporated herein by reference and are realleged as overt acts in furtherance of the conspiracy.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

From in or about October of 1994, and ending on a date unknown, but no earlier than in or about the date of the return of this Indictment, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

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- [1] ANGELA AYALA-MARTINEZ,
aka "La Señora,"
aka "La Vieja,"
- [2] MANUEL PEREZ-COLON,
aka "Tito Manuel,"
- [3] JORGE LUCAS SANTIAGO-RIVERA,
aka "Jay,"
- [6] YOLANDA RUIZ
- [7] JOSE CARASQUILLO,
aka "Joito,"
- [10] FRANKIE PIETRI-SEPULVEDA,
- [11] DANIEL SANTIAGO-ORTIZ,
aka "Danny El Gordo,"
- [12] WANDI AYALA,
- [13] EDDIE SEVILLA,
- [14] FELICITA SOTO,
aka " Fela,"
- [15] ANTONIO GONZALEZ-VEGA,
aka "Pollo,"
- [16] MARIA BARBOSA-RODRIGUEZ
- [17] CARLOS MANGUAL-SANTIAGO,
- [18] ANDY GARCIA-TORRES,
- [19] MANUEL GARCIA-TORRES,
- [20] EDWIN MELENDEZ-NEGRON,
aka "Danny Gongolo,"
- [23] ENRIQUE MALAVE-DIAZ,
aka "Enriquito,"
- [29] ALEXANDER BOSCARA-RODRIGUEZ,
- [31] MARTIN ARROYO CRUZ,
- [32] HECTOR DOMINICI-GONZALEZ,
- [33] MARIBEL DOMINICI, and
- [36] ORLANDO ROSA,
aka "Oly,"

did unlawfully, knowingly, intentionally, and willfully combine, conspire, and agree together and with each other and with other persons, both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, including:

a. To knowingly, conduct or attempt to conduct financial transactions, knowing that the proceeds involved in the financial transactions represented the proceeds of some form of unlawful

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activity, when the financial transactions in fact involved the proceeds of specified unlawful activity, to wit: the importation, sale, and otherwise dealing in narcotics or other dangerous drugs, as defined in Title 21, United States Code, with the intent to promote the carrying on of specified unlawful activity and knowing that the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1);

b. To knowingly engage or attempt to engage in a monetary transaction in criminally derived property that was of a value greater than \$10,000, which property was derived from specified unlawful activity, to wit: the importation, sale, and otherwise dealing in narcotics and other dangerous drugs, as defined in Title 21, United States Code, contrary to the provisions of Title 18, United States Code, Section 1957.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In order to facilitate the objects of the conspiracy, the defendants and co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico and elsewhere:

1. During the existence of the conspiracy [1] ANGELA AYALA-MARTINEZ would purchase real estate property and vehicles and place them in the names of third parties, including, among others,

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[32] HECTOR DOMINICI-GONZALEZ, [33] MARIBEL DOMINICI, and
[31] MARTIN ARROYO-CRUZ.

2. During different times of the conspiracy defendants and co-conspirators [2] MANUEL PEREZ-COLON, aka "Tito Manuel," [3] JORGE LUCAS SANTIAGO-RIVERA, aka "Jay," [7] JOSE CARASQUILLO, aka "Joito," [10] FRANKIE PIETRI-SEPULVEDA, [11] DANIEL SANTIAGO-ORTIZ, aka "Danny El Gordo," [15] ANTONIO GONZALEZ-VEGA, aka "Pollo," [16] MARIA BARBOSA-RODRIGUEZ, [17] CARLOS MANGUAL-SANTIAGO, [18] ANDY GARCIA-TORRES, [19] MANUEL GARCIA-TORRES, [20] EDWIN MELENDEZ-NEGRON, aka "Danny Gongolo," [23] ENRIQUE MALAVE-DIAZ, aka "Enriquito," [29] ALEXANDER BOSCANA-RODRIGUEZ, [36] ORLANDO ROSA, aka "Oly," and others, would deliver thousands of dollars in cash to [1] ANGELA AYALA-MARTINEZ, which were proceeds of their drug trafficking activities.

3. [1] ANGELA AYALA-MARTINEZ, with the assistance of [6] YOLANDA RUIZ and others, would conceal and store proceeds of her drug trafficking activities at the residences of [12] WANDI AYALA, [13] EDDIE SEVILLA, [14] FELICITA SOTO, and [16] MARIA BARBOSA-RODRIGUEZ and others.

4. Counts One, Four, Five and Six are incorporated herein by reference and are realleged as overt acts in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 1956(h).

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COUNT THREE

From in or about June of 1996, to in or about July of 1996, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

[5] FLORENCIO SANCHEZ-DE LEON,
 [7] JOSE CARASQUILLO,
 aka "Joito,"
 [34] SANTOS GONZALEZ-BRACERO, and
 [35] SAMMY RAMIREZ,

the defendants herein, did, knowingly, willfully, unlawfully, and intentionally, combine, conspire, and agree with each other and with divers other persons to the grand jury known and unknown, to commit an offense against the United States, to wit, to knowingly and intentionally possess with the intent to distribute multi-kilogram amounts of cocaine, a Schedule II Narcotic Drug Controlled Substance, which amounts of cocaine totalled approximately one hundred (100) kilograms, that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico or elsewhere, within the jurisdiction of this Court:

1. On or about July 7, 1996, [7] JOSE CARASQUILLO, aka "Joito," met with a confidential source and introduced [35] SAMMY

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RAMIREZ to the confidential source as the person that would act as a "runner" after they purchased the cocaine from the confidential source.

2. On or about July 22, 1996, [7] JOSE CARASQUILLO, aka "Joito," introduced [34] SANTOS GONZALEZ-BRACERO to a confidential source for the purpose of negotiating the purchase of one hundred (100) kilograms of cocaine.

All in violation of Title 21 United States Code Section 846.

COUNT FOUR

On or about April 16, 1996, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

[23] ENRIQUE MALAVE-DIAZ,
aka "Enriquito,"
[24] LUZ M. DIAZ-LUGO,
[25] FELIX R. MIRANDA-MUNOZ,
[26] ANGEL R. SUAREZ-VARGAS,
[30] JULIO GONZALEZ-MARTINEZ,
aka "El Viejo Juli,"

the defendants herein, aiding and abetting each other, did possess with the intent to distribute approximately seventy-eight (78) grams (net weight) of heroin, a Schedule I Narcotic Drug Controlled Substance and approximately thirty-two (32) grams (net weight) of cocaine, a Schedule II Narcotic Drug Controlled Substance; all in violation of Title 21, United States Code, Section 841 (a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about August 23, 1996, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

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[1] **ANGELA AYALA-MARTINEZ,**
aka "La Señora,"
aka "La Vieja," and
[16] **MARIA BARBOSA-RODRIGUEZ,**

the defendants herein, aiding and abetting each other, did possess with the intent to distribute one hundred, sixty and nine tenths (160.9) grams (gross weight) of cocaine, a Schedule II Narcotic Drug Controlled Substance; all in violation of Title 21, United States Code, §841(a)(1) and Title 18, United States Code, §2.

COUNT SIX

On or about December 13, 1996, in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court,

[1] **ANGELA AYALA-MARTINEZ,**
aka "La Señora,"
aka "La Vieja," and
[16] **MARIA BARBOSA-RODRIGUEZ,**

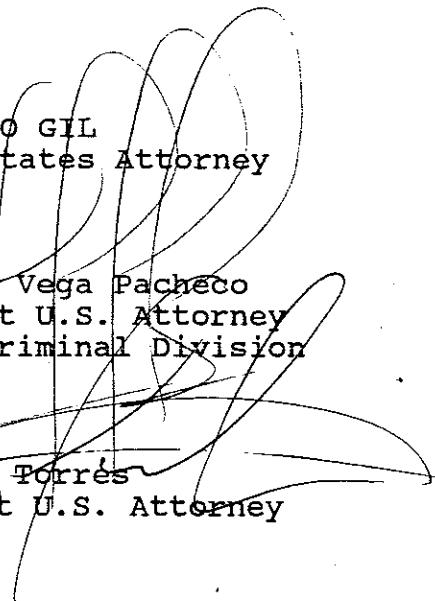
the defendants herein, aiding and abetting each other, did possess with the intent to distribute approximately one hundred, fifty-eight and six tenths (158.6) grams (gross weight) of cocaine, a Schedule II Narcotic Drug Controlled Substance; all in violation of

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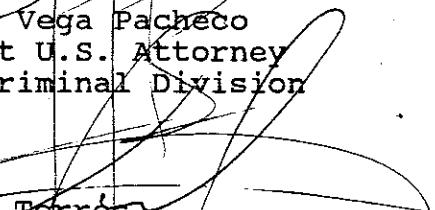
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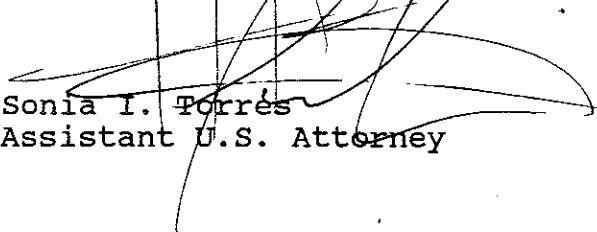
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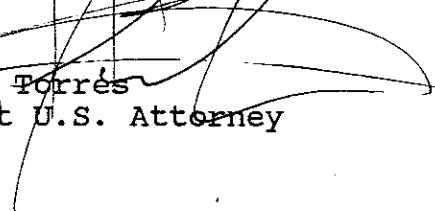
Title 21, United States Code, Section 841 (a)(1) and Title 18,
United States Code, Section 2.


FOREPERSON

GUILLERMO GIL
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